

Message

From: Brown, Christopher [Brown.Christopher.T@epa.gov]
Sent: 11/17/2022 10:17:52 PM
To: Valliquette, Arlene [Arlene.Valliquette@meritenergy.com]
CC: Lyles, Kat [Kat.Lyles@meritenergy.com]; Minter, Douglas [Minter.Douglas@epa.gov]; Bowling, Linda (she/her/hers) [Bowling.Linda@epa.gov]; Chin, Lucita [Chin.Lucita@epa.gov]; Wiser, Nathan [Wiser.Nathan@epa.gov]; Wang, Gary [wang.gary@epa.gov]; Johnson, Davionn [Johnson.Davionn@epa.gov]
Subject: RE: Circle Ridge UIC Permits
Attachments: 3147_001.pdf

Good afternoon Arlene,

I am writing to follow up our last phone conversation, as I have been informed that the financial assurance supplied by the Wind River Energy Commission (WREC) for the Shoshone 65-32 (WY20711-03776) and the Shoshone 66-46 (WY20000-03089) wells at the Circle Ridge Field has been approved.

The UIC Section has reviewed the original permit transfer request forms and written agreement between the parties (attached for reference) submitted by Merit Energy Company (Merit) on May 1, 2021. Based on the review, the language in the written agreement appears to suggest that the transfer was subject to receiving EPA approval by June 1, 2021 (Effective Date of the written agreement). Since the transfer of the Shoshone 65-32 (WY20711-03776) and the Shoshone 66-46 (WY20000-03089) wells was not approved by EPA by the Effective Date in the written agreement, an amendment to the written agreement (or a new written agreement) appears to be necessary; this should include a new specific date by which the transfer will take place. For the rule authorized Shoshone 66-46 well, the specific date is for transfer of ownership or operational control of the well pursuant to 40 Code of Federal Regulations (CFR) 144.28(l)(2). For the Shoshone 65-32 individual permit, the specific date is for transfer of permit responsibility, coverage, and liability pursuant to 40 CFR 144.41(d) (for transfer by minor modification). Since financial assurance for both wells has already been received/approved, the UIC Section could move forward with drafting a formal letter to approve the transfer of both wells upon receipt of the written agreement between the parties.

Let me know if you have any questions or would like to discuss next steps to finalize this transfer.

--

Chris Brown, P.G.
Physical Scientist
U.S. EPA Region 8, UIC Section
8WD-SDU | 1595 Wynkoop Street | Denver, CO 80202
Office: (303) 312-6669

From: Valliquette, Arlene <Arlene.Valliquette@meritenergy.com>
Sent: Friday, October 28, 2022 3:31 PM
To: Wang, Gary <wang.gary@epa.gov>; Brown, Christopher <Brown.Christopher.T@epa.gov>; Johnson, Davionn <Johnson.Davionn@epa.gov>
Cc: Wiser, Nathan <Wiser.Nathan@epa.gov>
Subject: RE: Circle Ridge UIC Permits

Thanks!!

From: Wang, Gary <wang.gary@epa.gov>
Sent: Friday, October 28, 2022 4:24 PM

To: Brown, Christopher <Brown.Christopher.T@epa.gov>; Johnson, Davionn <Johnson.Davionn@epa.gov>
Cc: Wiser, Nathan <Wiser.Nathan@epa.gov>; Valliquette, Arlene <Arlene.Valliquette@meritenergy.com>
Subject: FW: Circle Ridge UIC Permits

EXTERNAL EMAIL

Hi Arlene, I am forwarding your question to the Permitting group since they typically review the document as part of permit/well transfers.

@Brown, Christopher & @Johnson, Davionn, can either of you confirm Arlene's question in the email below?

Gary Wang
Underground Injection Control Enforcement
U.S. Environmental Protection Agency, Region 8
1595 Wynkoop St.
Denver, CO 80202
Mailcode: 8ENF-W-SD
PH: 303-312-6469
EMAIL: wang.gary@epa.gov

From: Valliquette, Arlene <Arlene.Valliquette@meritenergy.com>
Sent: Friday, October 28, 2022 11:20 AM
To: Wang, Gary <wang.gary@epa.gov>
Subject: Circle Ridge UIC Permits

Hi Gary,

Merit is being told the Tribes have submitted their financial surety for the final two injection well permits that remain in Merit's name. Those two are the Shoshone 65-32 (API 4901306820), permit number WY20711-03776 and the Shoshone 66-46A (API 4901306775) permit number WY20000-03089.

Can you confirm the Tribes have submitted the necessary financial surety to EPA for the transfer of these two remaining permits from Merit to them?? Thanks and regards,

Arlene

Arlene Valliquette, Regulatory Manager
Merit Energy Company, LLC
13727 Noel Road, Suite 1200
Dallas, TX 75240
(972) 628-1558